

# **EXHIBIT C**

**FILED UNDER SEAL**

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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**

10  
11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION,

Case No. 4:22-MD-03047-YGR

MDL No. 3047

13 This Document Relates to:

14 Tucson Unified School District v. Meta  
15 Platforms Inc., et al.

16 Case No.: 4:24-cv-1382

**PLAINTIFF'S THIRD AMENDED  
ANSWERS TO DEFENDANTS'  
INTERROGATORIES TO TUCSON  
UNIFIED SCHOOL DISTRICT (SET 1)**

1 PROPOUNDING PARTY: DEFENDANTS

2 RESPONDING PARTY: TUCSON UNIFIED SCHOOL DISTRICT

3 SET NO.: ONE (1)

4 DATE OF SERVICE: April 4, 2025

5 Pursuant to Federal Rules of Civil Procedure 26 and 33 and the Local Rules of this judicial  
6 district, the Tucson Unified School District (“Plaintiff”), hereby provides these third amended  
7 answers and objections to the Defendants’ Interrogatories to Tucson Unified School District (Set  
8 1) (the “**Interrogatories**”).

9 **PRELIMINARY STATEMENT**

10 Plaintiff has undertaken a reasonable effort to provide the information requested by these  
11 Interrogatories to the extent the requested information is not subject to objection, but Plaintiff has  
12 not yet received complete discovery from Defendants, and Plaintiff has not completed its  
13 investigation of the facts relating to this Action. Discovery is ongoing and additional information  
14 may be obtained that may alter these responses. The following responses and objections are based  
15 upon information that has been collected and reviewed to date for the purpose of these  
16 Interrogatories and are not prepared from any personal knowledge of any single individual.  
17 Accordingly, all the following responses are given without prejudice to, and with the express  
18 reservation of, Plaintiff’s right to supplement or modify its responses and objections to address  
19 additional information, and to rely upon any and all such information and documents at trial or  
20 otherwise.

21 **OBJECTIONS TO DEFINITIONS**

22 The following applies to each Interrogatory.

23 1. Plaintiff objects to Defendants’ definition of “Alleged Harm” on the grounds that it  
24 calls for a legal conclusion or Expert Opinion. Further, as discovery is just beginning, and the  
25 factual record is not yet complete, additional injury and harm may need to be supplemented during  
26 fact discovery or expert discovery.

27 2. Plaintiff objects to Defendants’ definition of “Relevant Time Period” as it is  
28 overbroad, calls for a legal conclusion or Expert Opinion, and is inconsistent with the relevant time

1 frame thus far established in this litigation. “Relevant Time Frame” shall mean, as agreed by the  
 2 Parties, from August 1, 2014 to April 1, 2024 or the date of collection, whichever is earlier. Plaintiff  
 3 reserves the right to change or modify the Relevant Time Frame based on further investigation or  
 4 fact and/or expert discovery.

5 3. Plaintiff objects to Defendants’ definition of “Plaintiff,” “You,” and “Your,” as  
 6 overly broad, unduly burdensome, and seeking the production of information that is not relevant to  
 7 the claims or defenses of any party, not proportional to the needs of the case, and not reasonably  
 8 accessible to Plaintiff upon reasonable diligence. Furthermore, the definition of these terms is over  
 9 broad to the extent it would require Plaintiff to respond to these Interrogatories for people  
 10 “purporting to act on its behalf” and to the extent it purports to include any of the persons identified  
 11 in their personal capacities rather than as officers and employees of Plaintiff. Plaintiff objects  
 12 further to this definition as seeking Privileged Information because the definition includes  
 13 Plaintiff’s attorneys.

14 4. Plaintiff’s answers are made without waiving its right to object (on the grounds of  
 15 relevance, hearsay, materiality, competency, or any other ground) to the use of its responses in any  
 16 subsequent stage or proceeding in this action or any other action.

17 5. If Plaintiff, in response to any Interrogatory, inadvertently produced information  
 18 that is or could be the subject of the objections stated herein, such production is not intended to be,  
 19 nor is it deemed to be, a waiver of the objections with respect to such information provided or  
 20 withheld.

## 21 **RESPONSES TO INTERROGATORIES**

### 22 **INTERROGATORY NO. 1:**

23 Identify every Person likely to have discoverable information related to Plaintiff’s claims,  
 24 including Persons (a) likely to have personal knowledge that supports or contradicts a position or  
 25 claim that You have taken or intend to take in this Action, or (b) upon whom You intend to rely in  
 26 proving Your claims, and for each such Person, and for each such Person, describe that personal  
 27 knowledge.  
 28

**RESPONSE:**

Plaintiff objects to this Interrogatory as overly broad, unduly burdensome, and disproportionate to the needs of the case to the extent it purports to require Plaintiff to identify “every Person” whether employed by Plaintiff or third parties, or any other Person who may have any knowledge concerning the claims in the action. Plaintiff objects further to this Interrogatory to the extent it calls for the mental impressions of counsel, the identity of non-testifying experts, the premature disclosure of the identity of testifying experts, or otherwise seeks information protected from disclosure by the attorney-client privilege or work product doctrine. Plaintiff will make appropriate expert disclosures pursuant to deadlines set by the Court and in accordance with the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Plaintiff states, based on the information currently available to it, that the following persons currently or formerly employed by Plaintiff may have material knowledge of Plaintiff’s allegations in this action and can be contacted through Plaintiff’s counsel:

Last Name	First	Job Title	Subject Matter
Aguayo	Vanessa	Program Coordinator	Impact of students’ use of social media on school property and impact on district operations, including addressing student mental health needs and student engagement.
Alvarez	Mark	Assistant Superintendent	Impact of students’ use of social media on school operations, including discipline and student engagement.
Amidan	Kevin	Principal, Sabino High School	Prevalence and impact of student social media use.
Armenta	Frank	Assistant Superintendent	Impact of students’ use of social media on school operations, including discipline and student engagement.
Begay-James	Roxanne	Director, Native American Student Services	Impact of students’ use of social media on school operations, including discipline and student and family engagement for Native American Students.

1	Brown	Kinasha	Assistant Superintendent	Impact of students' use of social media on school and district operations, including discipline, student mental health needs and student and family engagement.
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4	Carrier	Rebecca	Program Coordinator	Impact of students' use of social media on school and district operations, including addressing student mental health needs and student engagement.
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7	Coleman	Jeffrey	Director, School Safety	Student discipline incidents and disruptive student behavior.
8	Escamilla	Karla	Director, Communications & Media Relations	Issues impacting the district, including stakeholder concerns.
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10	Federico Brummer	Maria	Director, Mexican American Student Services	Impact of students' use of social media on school operations, including discipline and student and family engagement for Latino Students.
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13	Gaw	Dr. Joseph	Director, Health Services	Impact of student use of social media in schools, including mental and physical health needs.
14				
15	Grijalva	Lacey	Director, Family and Community Outreach	Student and family engagement.
16				
17	Hallums	Joseph	Director, School Safety	Student discipline incidents and disruptive student behavior.
18	Hamadeh	Rabih	Exec. Director, Technology Services	Impact of student use of social media on school and district technology systems, including bandwidth needs and efforts to safeguard students.
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21	Hammel	Holly	Assistant Superintendent	Knowledge of students' use of social media on school operations, including discipline and student engagement.
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23	H [REDACTED]	M [REDACTED]	Tucson High Magnet School Junior	Prevalence and impact of student social media use.
24	Hernandez	Ricardo	Chief Financial Officer	Financial impact of students' use of social media in schools; district budget.
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26	Huitt	Dr. Flori	Assistant Superintendent	Impact of students' use of social media on school and district operations, including student engagement and impact on curriculum.
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1	Konrad	Michael	Principal	Impact of students' use of social media on school operations, including discipline and student engagement.
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3	Lambert	Brian	Assistant Superintendent	Impact of students' use of social media on school operations, including discipline and student engagement.
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5	Lane	Josephine	Principal, Wakefield Middle School	Prevalence and impact of student social media use.
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7	Lansa	Jonathan	Director, Title I	Use of grant monies to meet student social-emotional needs.
8	Lowery	Nicole	Risk Manager	Incidents in the district involving property damage.
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10	Meier	Gregory	Director, Facilities Management	Damage to district property.
11	Osiago	Susan	Director, Asian Pacific American Refugee Student Services	Impact of students' use of social media on school operations, including discipline and student and family engagement for APARS Students.
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13	Rodriguez	Shawna	Assistant Superintendent	Impact of student social media use on district operations, including disruptive student behavior.
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15	Rose	Ernest	Assistant Superintendent	Impact of students' use of social media on school operations, including discipline and disruptive behavior.
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17	Rubio	Clarinda	Dean of Students, Tucson High Magnet School	Prevalence and impact of student social media use.
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19	Salmon	Dr. Sabrina	Director, Exceptional Education	Impact of student social media use on district, including students with various disabilities and the impact social media has had on their learning.
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21	Sanchez	Richard	Assistant Superintendent	Impact of students' use of social media on school operations, including discipline and student engagement.
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23	Schwartz-Warmbrand	Anna	Director, Student Relations	Impact of students' use of social media on school operations, including student support.
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25	Shivanonda	Julie	Director, Social Emotional Learning	Impact of students' use of social media on school and district operations, including addressing student mental health needs and student support services.
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Startt	Kevin	Director, Purchasing	District finances and purchasing.
Stefan	Nikki	Director, Health Services	Impact of student use of social media in schools, including mental and physical health needs.
Stephens	Tina	Director, Title I	Use of grant monies to meet student social-emotional needs.
Strozier	Tonya	Director, African American Student Services	Impact of students' use of social media on school operations, including discipline and student engagement and family for African-American Students.
Trujillo	Dr. Gabriel	Superintendent	Impact of students' use of social media on school and district operations, including discipline and student and parent engagement.
Weatherless	Renee	Chief Financial Officer	Financial impact of students' use of social media in schools; district budget.
Young	Blaine	Chief Operations Officer	Impact of social media use on district operational needs.

## **INTERROGATORY NO. 2:**

For each Defendant, state the years during which You claim such Defendant engaged in conduct for which You seek damages, as well as the time period for any abatement or other equitable relief.

## **RESPONSE:**

Plaintiff objects to the Interrogatory as premature to the extent it seeks information about subjects of ongoing discovery, including expert discovery. Plaintiff's investigation is ongoing, Plaintiff has not received sufficient discovery from Defendants, and the factual record is incomplete. Plaintiff objects to the Interrogatory to the extent it calls for expert opinion. Plaintiff objects further because the Interrogatory is compound, consisting of multiple subparts relating to 1) years of Defendants' relevant harmful conduct for which damages are sought and 2) the time period for abatement or other equitable relief.

Subject to and without waiving the foregoing objections, Plaintiff states, based on the information currently available, that Defendants have engaged in conduct over the following time



frames which has led to the Plaintiff's damages and/or requires abatement or other equitable relief. For the Meta Defendants, at least back to 2004. For the TikTok Defendants, at least back to 2012. For the YouTube Defendants, at least back to 2005. For Defendant Snap Inc., at least back to 2011. Based on the information currently available, Plaintiff anticipates seeking damages from at least the 2016-2017 academic year. Plaintiff reserves the right to amend and/or supplement its response to this Interrogatory as more information becomes available. Plaintiff states further that it will make appropriate expert disclosures concerning damages and abatement or other equitable relief in accordance with the deadlines set by the Court and the Federal Rules of Civil Procedure.

**INTERROGATORY NO. 3:**

Separately identify and describe (including the date, location, nature and extent, and cost of repair or replacement) every instance of vandalism, property damage, or criminal action You contend occurred as a result of Online Media & communications Services.

**RESPONSE:**

Plaintiff objects to this Interrogatory as overly broad, unduly burdensome, and disproportionate to the needs of the case to the extent it purports to require Plaintiff to identify and describe every instance of vandalism, property damage, or criminal action that occurred as a result of social media regardless of whether Plaintiff intends to claim such damage as damages in this action. Plaintiff objects further to the Interrogatory as vague and ambiguous because the phrase "property damage" is subject to multiple interpretations and may call for a legal conclusion. Plaintiff objects further to the Interrogatory as premature to the extent it seeks expert opinion and because discovery is ongoing. Plaintiff's investigation is ongoing, Plaintiff has not received sufficient discovery from Defendants, and the factual record is incomplete. Plaintiff objects further because the Interrogatory is compound, consisting of multiple subparts relating to 1) vandalism, 2) property damage, or 3) criminal action.

Subject to and without waiving the foregoing objections, Plaintiff states that over the last several years, Plaintiff has incurred significant damage to its property resulting from Defendants promoting, developing, or participating in the creation of social media platforms which promote

addictive and compulsive use by Plaintiffs' students. This includes damage to district bathrooms, such as soap, toilet paper, and towel dispensers damaged or stolen, sinks pulled from the wall, damaged bathroom doors, blocked bathroom drains, and damaged toilets. Outside of the bathroom, the property damage incurred by Plaintiff resulting from students' use of social media includes damage to fire extinguishers, school signs, drinking fountains, locker rooms, lighting, classroom tables and desks, and an outdoor stage. These and related issues involving student social media use have forced Plaintiff to lock bathrooms during certain times of the day. Such incidents include, but are not limited to:

Date	School Site	Description	Expense
12/11/2018	Alice Vail Middle School	Exit sign in central hall vandalized	\$173.61
12/5/2017	Banks Elementary School	Outside cafeteria door and mechanical door vandalized, spray foam inserted in locks.	\$84.91
11/5/2018	Blenman Elementary School	Broken toilet	\$89.74
10/3/2017	Bloom Elementary	Windows were broken.	\$162.64
10/6/2017	Booth-Fickett K8	Portable vandalized, damaged ceiling tiles, exposed wires, cement spread on floor, paint and graffiti on the walls	-
10/25/2018	Booth-Fickett K8	Holes in the walls of cafeteria.	\$12.30
2/5/2019	Booth-Fickett K8	Classroom door vandalized, unable to secure room.	\$38.58
10/31/2018	C.E. Rose Elementary School	Repair drywall due to vandalism.	\$306.72
11/16/2018	C.E. Rose Elementary School	Ceiling light vandalized. Repair cover.	\$63.97
10/6/2017	Cholla High School	Replace glass display case that was vandalized.	\$114.19
12/21/2017	Cholla High School	Gym snack bar fire alarm cover vandalized	-
1/10/2018	Cholla High School	Girls PE locker room door damaged.	-
1/19/2018	Cholla High School	Elliot Gym lobby case damaged. Need locks replaced.	-
1/25/2018	Cholla High School	Girls PE locker room entry/exit door damaged by vandalism	-
2/16/2018	Cholla High School	Girls restroom sinks vandalized	-

1	2/16/2018	Cholla High School	Boys restroom toilet stalls vandalized	-
2	3/16/2018	Cholla High School	Reinstall cabinet door on lab desk that was vandalized	-
3	3/21/2018	Cholla High School	Gym lobby glass display case broken-vandalized.	-
4	3/21/2018	Cholla High School	Reinstall thermostat vandalized in hallway	-
5	10/9/2018	Cholla High School	Replace ceiling tiles that were knocked out of place by vandalism.	-
6	10/25/2018	Cholla High School	Reinstall ceiling tiles in A&C pods vandalized.	-
7	10/25/2018	Cholla High School	Replace pencil sharpener and repair damaged desk due to vandalism	-
8	10/29/2018	Cholla High School	Girls restroom finish sealing around sinks that were reinstalled due to vandalism.	\$7.39
9	11/13/2018	Cholla High School	Theater entry/exit door handle vandalized.	-
10	11/15/2018	Cholla High School	Girls PE locker room bathroom partition broken by vandalism.	-
11	11/27/2018	Cholla High School	Boys locker room toilet partition vandalized	-
12	11/27/2018	Cholla High School	Mens restroom toilet partitions vandalized	-
13	11/27/2018	Cholla High School	PE boys custodial closet door vandalized	-
14	11/29/2018	Cholla High School	Broken basketball rim, loops to hang net vandalized	-
15	11/29/2018	Cholla High School	Boys restroom toilet partition destroyed by vandalism.	-
16	12/19/2018	Cholla High School	Boys restroom vandalized	-
17	1/9/2019	Cholla High School	Fire alarm pull station in hall damaged due to vandalism.	-
18	1/24/2019	Cholla High School	Portable podium has been damaged.	-
19	2/13/2019	Cholla High School	Commons area electrical receptacle vandalized	-
20	3/13/2019	Cholla High School	Sound system cabinet vandalized.	-
21	3/29/2019	Cholla High School	Exit sign vandalized - C pod	\$22.05
22	3/29/2019	Cholla High School	Exit sign vandalized - A pod	\$22.05

1	4/3/2019	Cholla High School	Ceiling tiles in gym damaged due to vandalism.	-
2	10/22/2019	Cholla High School	Boys PE locker room handle and mounting plate damaged.	-
3	10/31/2019	Cholla High School	Fire extinguisher cabinets vandalized.	\$51.44
4	11/6/2019	Cholla High School	vandalized fire alarm strobe to be replaced or reinstall	-
5	11/19/2019	Cholla High School	Boys restroom toilet partition destroyed by vandalism	-
6	11/21/2019	Cholla High School	Boys custodial closet in restroom damaged by vandalism	\$348.98
7	11/27/2019	Cholla High School	Boys restroom sink broken by vandalism	\$100.00
8	11/27/2019	Cholla High School	Boys restroom paper towel and sink dispensers vandalized	-
9	12/10/2019	Cholla High School	Entry/exit-door to locker room vandalized	-
10	1/7/2020	Cholla High School	Repair hole in ceiling above drinking fountain due to vandalism next to boys restroom.	-
11	1/8/2020	Cholla High School	Entry/exit door to classroom damaged by vandalism.	-
12	2/7/2020	Cholla High School	Auditorium vandalized-audio system damaged	\$90.44
13	8/10/2020	Cholla High School	Urinal and sink vandalized.	\$1,898.37
14	9/30/2021	Cholla High School	Boys restroom urinals vandalized with rocks.	-
15	10/1/2021	Cholla High School	30 soap dispensers vandalized, need replacements.	\$16.20
16	12/7/2021	Cholla High School	Sink in girls restroom vandalized, need to replace.	\$51.68
17	6/24/2022	Cholla High School	Boys restroom vandalized.	\$77.52
18	2/13/2023	Cholla High School	Boys restroom doors in south gym vandalized, unable to open.	\$135.25
19	2/17/2023	Cholla High School	Boys south gym restroom vandalized.	\$213.03
20	3/2/2023	Cholla High School	South Gym boys restroom vandalized.	\$321.50
21	11/12/2019	Cragin Elementary School	Bathroom vandalized, graffiti, wall and ceiling patching coming up. Patch and repaint.	\$51.24
22	11/19/2019	Dodge Magnet Middle School	Door to boys restroom broken	\$51.44
23	12/13/2019	Doolen Middle School	Drop down ceiling damaged due to vandalism	\$209.02
24	2/25/2020	Doolen Middle School	Thermostat in boys restroom pulled off	\$90.15

		wall	
9/15/2021	Doolen Middle School	Soap dispenser vandalized	
2/28/2018	Gridley Middle School	Sinks in boys restroom damaged	\$212.03
10/30/2019	Gridley Middle School	Boys restroom stall kicked in.	\$73.77
2/13/2019	Henry Elementary School	Drinking fountain vandalized, filled with sand.	\$88.39
1/12/2022	Hollinger K-8	Restroom vandalized. Toilet paper and paper towel dispenser taken off wall, possibly kicked.	\$49.20
6/19/2023	Hudlow Elementary School	Boys and girls restroom vandalized.	\$389.36
11/13/2017	Magee Middle School	Student jumped on water fountain, broke off wall.	\$48.76
10/25/2018	Magee Middle School	Damaged toilet, spraying water.	51.68
10/20/2021	Magee Middle School	Students poured glue, bottle of paint, paintbrushes, and papertowels down sinks.	\$51.68
11/22/2021	Magee Middle School	Soap dispenser vandalized	\$49.18
3/28/2022	Magee Middle School	Boys restroom toilet broken	\$225.59
9/16/2021	Magee Middle School	Soap dispenser vandalized.	\$30.78
	Magee Middle School	soap dispenser vandalized	
	Magee Middle School	clogged toilet from vandalism	
1/30/2020	Mansfeld Middle School	Student broke fire sprinkler head on second floor. Water flowing to first floor.	\$180.04
3/29/2019	Mary Meredith K-12	Front access control door vandalized	\$165.39
9/30/2021	Mission View Elementary School	Boys restroom soap dispenser vandalized, need replacement.	\$30.75
12/6/2019	Morgan Maxwell K8	Soap dispenser vandalized	-
11/24/2021	Morgan Maxwell K-8	Girls restroom sinks vandalized. Replace 4 sink handles.	\$801.74
12/16/2021	Morgan Maxwell K-8	Boys restroom sink handle broken off.	\$179.20
10/4/2017	Pistor Middle School	Exit sign near cafeteria bathroom vandalized, ripped off wall.	\$239.49
10/4/2017	Pistor Middle School	Related to WO 58839-unsure if sprinkler damaged due to exit sign being ripped from wall.	\$18.20
1/9/2018	Pistor Middle School	Damaged bathroom repainted.	\$157.11
12/3/2021	Pistor Middle School	4 hand soap dispensers broken (2 boys and 2 girls restroom). Need replacement.	\$49.18
11/5/2018	Project More High School	Need replacement window vandalized by student.	\$138.28
	Pueblo Gardens K8	Soap dispenser vandalized	
	Pueblo Gardens K8	Soap dispenser vandalized	
	Pueblo Gardens K8	Student chairs vandalized (approximately	

		20)	
11/19/2021	Pueblo High School	25 soap dispensers vandalized and need replacement.	\$53.30
11/2/2022	Pueblo High School	Sink in girls restroom vandalized and broken. Need replacement.	
4/18/2023	Pueblo High School	Boys restroom gym vandalized. Need replacement parts.	\$16.25
9/7/2022	Rincon High School	Restroom vandalized, ADA sink torn off wall.	\$51.68
10/30/2017	Rincon/UHS	Panic bar vandalized.	-
10/2/2019	Rincon/UHS	Replace vandalized exterior drinking fountain, Material only/Labor will be inhouse - damaged beyond repair	-
9/13/2021	Roberts Naylor K-8	Soap and towel dispensers damaged/removed from wall.	\$228.15
12/18/2017	Roberts/Naylor K8	Exit sign near kinder hallway vandalized	\$79.83
2/2/2018	Roberts/Naylor K8	Ceiling vents broken, used by students to hide items	\$339.05
10/9/2018	Roberts/Naylor K8	Exit destroyed by vandalism.	\$240.60
2/7/2020	Sabino High School	Replace broken lens covers for hallway.	\$18.11
2/28/2020	Sabino High School	Boys restroom handicap stall vandalized	\$104.51
11/8/2021	Sabino High School	Boys locker room drinking fountain vandalized. Kicked off wall, need replacement.	\$155.04
	Sabino High School	Bathroom stall doors vandalized	
10/1/2018	Safford K-8	Seats in auditorium vandalized.	\$1,214.74
11/16/2018	Safford K-8	Classroom vandalized, broken locks.	\$57.87
12/5/2018	Safford K-8	Vandalism to gate behind tech building.	\$180.04
12/17/2018	Safford K-8	Door frame to mechanical room vandalized, room flooded	\$38.76
12/17/2018	Safford K-8	Request for lock change due to ongoing vandalism to mechanical room.	-
2/10/2020	Sahuaro High School	Boys bathroom partition vandalized	\$165.98
2/11/2020	Sahuaro High School	Boys bathroom sinks vandalized.	\$742.24
3/10/2022	Sahuaro High School	12 soap dispensers vandalized, need replacements	\$30.86
2/10/2022	Santa Rita High School	Boys restroom damage to paper towel dispensers, need two replaced.	\$86.09
10/18/2018	Secrist Middle School	Sanitary napkin dispenser vandalized, metal pieces sticking out.	\$12.30
12/6/2018	Secrist Middle School	Student vandalized microphone on stage.	\$199.33

1	6/6/2023	Tucson High Magnet School	Restrooms on three floors vandalized-drain lines blocked w-cement causing water leakage.	\$607.24
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3	11/13/2017	Tucson Magnet High School	Water fountains vandalized, removed from wall	\$35.00
4	12/5/2017	Tucson Magnet High School	Faucet in boys restroom vandalized.	\$25.00
5	12/14/2017	Tucson Magnet High School	Doors on west side of gym basement vandalized.	\$60.00
6	2/14/2018	Tucson Magnet High School	Girls restroom sink vandalized	\$73.67
7	10/9/2018	Tucson Magnet High School	The restroom vandalized.	\$30.00
8	12/13/2018	Tucson Magnet High School	Tech building doors broken due to vandalism	\$130.00
9	9/21/2021	Tucson Magnet High School	Soap dispenser vandalized	-
10	12/1/2021	Tucson Magnet High School	Boys restroom paper towel dispenser vandalized. Request for new, site to install	-
11				
12	2/16/2022	Tucson Magnet High School	Damaged soap dispenser in boys restroom	\$10.00
13	9/1/2022	Tucson Magnet High School	Sink vandalized	-
14	10/2/2023	Tucson Magnet High School	Replace broken soap dispenser	\$20.00
15	11/28/2023	Tucson Magnet High School	Replace paper towel dispensers.	\$20.00
16	2/20/2024	Tucson Magnet High School	Broken sink repair	\$25.84
17	2/29/2024	Tucson Magnet High School	Paper towel dispenser replacement	\$10.00
18				
19	10/18/2017	Tully Elementary	Replace broken toilet in boys restroom	\$352.43
20	10/27/2021	Vail Middle School		\$50.69
21	12/4/2017	Valencia Middle School	Drinking fountain vandalized, broken water pipe	\$48.76
22	9/24/2021	Valencia Middle School	Boys restroom vandalized. Sinks pulled down from wall and broke sink faucets.	\$669.22
23	10/26/2021	Valencia Middle School	10 soap dispensers vandalized, need replacements.	\$251.46
24	11/17/2022	Valencia Middle School	Toilet in boys restroom vandalized. Needs replacement.	\$416.55
25	8/29/2022	Valencia Middle School	Urinal vandalized	-
26	1/7/2020	Vesey Elementary School	Girls restroom toilet tank broken.	\$25.84
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2 The above list includes information Plaintiff was able to discern following a reasonably  
3 diligent investigation. Where information is not included, Plaintiff has been unable to confirm that  
4 information. Plaintiff has reason to believe that each of the above identified incidents was caused  
5 by Defendants' conduct. In addition to the expenses identified above, Plaintiff has expended  
6 significant human resources to address these harms. In many instances, no direct expense is tracked  
7 because the damage was remediated by Plaintiff's staff using existing maintenance inventory or  
8 did not require direct expense but, rather, staff time to remediate. In addition, these incidents  
9 prevent Plaintiff from full use and enjoyment of its property.

10  
11 Dated: April 4, 2025

**WAGSTAFF & CARTMELL LLP**

/s/ Austin Brane

Austin Brane

14 Thomas P. Cartmell (*pro hac vice*)

Jonathan P. Kieffer (*pro hac vice*)

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